REMARKS/ARGUMENTS

The office action of October 6, 2004 has been carefully reviewed and these remarks are responsive thereto. By the present amendment claims 11 and 24 are amended, and new claims 32-49 have been added. Claims 1-49 thus remain pending in this application. Reconsideration and allowance of the instant application are respectfully requested.

Rejections Under 35 U.S.C. § 112

Claims 11 and 24 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite due to insufficient antecedent basis. Claims 11 and 24 have been amended to provide correct antecedent basis, and Applicant respectfully requests the rejection be withdrawn.

Rejections Under 35 U.S.C. § 102

Claims 1-10, 12-14, 17-23, 25, 26, and 28-31 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Moore *et al.* (U.S. Pat. No. 6,310,601 B1, hereinafter Moore). Applicants respectfully traverse this rejection for at least the following reasons.

In order to reject a claim as anticipated under 35 U.S.C. §102, a single prior art reference must teach every aspect of the claimed invention. MPEP § 706.02. Independent claim 1 recites, *inter alia*:

> associating one or more of the device feature values with a requesting user network terminal device in response to said requesting user network terminal device transmitting a request for the authored content; and
> converting the device-independent content into a device-specific content adapted to said requesting user network terminal device

However, Moore does not teach or suggest the above recitations of claim 1. While Moore is generally directed to a method for resizing an image on a server (Moore, Abstract), Moore does not resize the image based on device feature values associated with a requesting user network terminal device. Instead, Moore resizes the image based on tags and variables found within the HTML code itself. Stated another way, Moore determines whether an HTML document (i.e., a web page) specifies the size in which an image in the document is to be displayed irrespective of the device on

which the image will be displayed. For example, Moore searches for size directives within IMG tags in the HTML code (Moore, col. 5, lines 19-32). If the HTML document includes any image size directives, then the image is scaled down to meet the size directives, if possible, in order to send as small an image file as possible yet still meet the size directives of the HTML code. The same resizing is performed for every device, because the resizing is based on the HTML code stored on the server, and not based on the intended device. As is understood in the art, the same HTML code stored on the server is provided to any device requesting the URL corresponding to the HTML code. The method of Moore will perform the same resizing, regardless of the device that requests the HTML code, based on the IMG tag and size directives found within the HTML code, because the same HTML code is provided to any device requesting the corresponding URL. The resizing in Moore does not depend in any way, shape or form on the requesting device, or any device feature value associated with a requesting user network terminal device.

In addition, because Moore does not resize images based on any device feature value, Moore also does not convert the image into a device-specific content adapted to said requesting user network terminal device, as claimed. Instead, Moore converts the image into web page specific content adapted to the requested HTML code, irrespective of the end-user device to which the HTML code is being sent.

Moore thus does not anticipate claim 1, and claim 1 is allowable. Dependent claims 2-10, 12-14, and 17 are also allowable based at least on the allowability of claim 1.

In addition, Moore is similarly deficient with respect to claim 2, in that Moore does not specify a feature-value set for the plurality of user network terminal devices, as claimed. Instead, Moore identifies features of an image to be displayed according to HTML code, and the same HTML code is served regardless of the requesting device.

Moore is similarly deficient with respect to dependent claims 3-10, 12-14, and 17, in that the resizing method described in Moore is based only on the served HTML code, and is not based in any way on the device which is receiving the HTML code from the server.

Independent claim 18 is allowable for similar reasons as claim 1, including that Moore does not teach or suggest a transformer for associating one or more user network terminal device feature values with said requesting user network terminal device in response to receiving said

user network terminal device identification from said terminal device detector, for receiving said device-independent content from said origin server, and for transforming said device-independent content into device-specific content formatted for the requesting user network terminal device, as claimed.

Moore is similarly deficient with respect to dependent claims 19-23.

Independent claim 25 recites, inter alia, "based on said request, identifying display characteristics associated with the terminal device; converting the content into a device-dependent format...." However, as discussed above, Moore does not identify display characteristics associated with the terminal device. Instead, Moore identifies display characteristics associated with the HTML code, and converts an image based on the characteristics associated with the HTML code. Moore also does not convert content into a device-dependent format, but rather converts an image into an HTML-dependent format.

Moore is similarly deficient with respect to dependent claims 26 and 28-31.

Rejections Under 35 U.S.C. § 103

Claims 11 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore in view of Britton *et al.* (U.S. Pat. No. 6,654,814 B1, hereinafter Britton).

Claims 15 and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore in view of Rohrabaugh *et al.* (U.S. Patent Publication No. 2002/0091738 A1, hereinafter Rohrabaugh).

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Moore in view of Lo *et al.* (U.S. Pat. No. 6,523,040 B1, hereinafter Lo).

These rejections are respectfully traversed, as each of claims 11, 15, 16, 24, and 27 is allowable at least based on the allowability of their respective base claims. In addition, the additionally cited references do not cure the deficiencies of Moore.

New Claims

Applicant has added new claims 32-49, supported by the application as filed, which indicate that the device feature values are display feature values. No new matter has been added.

CONCLUSION

All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the examiner is requested to contact the undersigned at (202) 824-3153.

Respectfully submitted,

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Dated this 29th day of Nov., 2004   By:

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